

SUPPORTING STATEMENT

Interagency Record of Individual Requesting Change/Adjustment to or From A or G
Status or Requesting A, G, or NATO Dependent Employment Authorization **Form I-566**
OMB NO. 1615-0027

A. Justification:

1. U.S. Citizenship and Immigration Services (USCIS) requires eligible dependents of A-1, A-2, G-1, G-3, G-4 or NATO 1-6 nonimmigrants to use this form in connection with their applications for employment authorization. (Definitions and eligibility requirements may be found in 8 CFR 214.2(a), 214.2(g) and 214.2(s)).

Foreign government diplomats and officials and their personal employees (classified as A-1, A-2 and A-3), representatives of international organizations and their personal employees (classified as G-1 through G-5), and officials or employees of the North Atlantic Treaty Organization and their personal employees (classified as NATO-1 through NATO-7) use this form in connection with their, or their family member's, request to change to another nonimmigrant classification or to adjust their nonimmigrant status to lawful permanent resident status.

2. The data on this form is used by Department of State (DOS) to certify to USCIS eligibility of dependents of A or G principals requesting employment authorization, as well as for North Atlantic Treaty Organization/Headquarters, Supreme Allied Commander Transformation (NATO/HQ SACT) to certify to USCIS similar eligibility for dependents of NATO principals. DOS also uses this form to certify to USCIS that certain A, G or NATO nonimmigrants may change their status to another nonimmigrant status. USCIS, on the other hand, uses data on this form in the adjudication of change or adjustment of status applications from aliens in A, G, or NATO classifications, and following any such adjudication informs DOS of the results by use of this form.

The information provided on this form continues to ensure effective interagency communication among the three governmental departments, the Department of Homeland

Security (DHS), the DOS, and the Department of Defense (DOD), as well as with NATO/HQ SACT. These departments and organizations utilize this form to facilitate the uniform collection and review of information necessary to determine an alien's eligibility for the requested immigration benefit. This form also ensures that the information collected is communicated among DHS, DOS, DOD, and NATO/HQ SACT regarding each other's findings or actions.

3. The use of this form provides the most efficient means for collecting and processing the required data. In this case, USCIS does not employ the use of information technology in collecting and processing information. Currently this form has not been designated under the Business Transformation Project.
4. A search of USCIS automated forms tracking system was accomplished and revealed no duplication. There is no similar data collected.
5. This collection of information does not have an impact on small businesses or other small entities.
6. If this information is not collected, USCIS would not be able to adjudicate requests for work authorization from dependents of A, G, or NATO, as well as change of status requests and adjustment applications for aliens in these classifications, because receipt of this form from DOS and NATO/HQ SACT certifying eligibility in accordance with bilateral or *de facto* employment agreements to seek these benefits is required prior to USCIS adjudication. In addition, information that aliens in these classifications have adjusted their status to lawful permanent residents would not be communicated to DOS and NATO/HQ SACT, and thereby not allowing DOS and NATO/HQ SACT the required information to remove such aliens from their respective databases and to undertake other appropriate actions.
7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.
8. This version of the Form I-566 has been shared with DOS and NATO/HQ SACT and their comments were solicited. DOS and NATO/HQ SACT requested some minor

changes and these were incorporated. Public comments cannot be addressed in this initial submission. Public comments will be reconciled and addressed in USCIS' second submission.

9. USCIS does not provide payments or gifts to respondents in exchange for a benefit sought.

10. There is no assurance of confidentiality.

11. There are no questions of a sensitive nature.

12. Annual Reporting Burden:

a. Number of Respondents	5,800
b. Number of Responses per Respondent	1
c. Total Annual Responses	5,800
d. Hours per Response	.250
e. Total Annual Reporting Burden	1450

Annual Burden Hours

The total annual reporting burden hours are **1450**. This number is calculated by multiplying the number of respondents (5,800) x (1) number of responses x .250 (15 minutes) per responses.

13. There are no capital or start-up costs associated with this information collection. Any cost burden to respondents as a result of this collection are identified in item 14. **(There are no fee charges associated with this information collection).**

14. Annualized Cost Analysis:

a. Printing Cost	\$ 5,200
b. Collecting and Processing	\$ 232,000
c. Total Cost to Program	\$ 237,200
d. Fee Charge	\$ 0.00
e. Total Cost to Government	\$ 237,200

Government Cost

The estimated annual cost to the Government is \$ 237,200. This figure is calculated by using the estimated number of respondents 5,800 x 1 hour (time required to collect and process information) x \$ 40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). In addition, this figure includes the estimated overhead cost for printing, stocking, and distributing the form which is \$ 5,200.

Public Cost

The estimated annual public cost is \$14,500. This estimate is based on the number of respondents (5,800) x 15 minutes (.250 hours) per response x \$10 (average hourly rate).

15. There has been an increase in the burden hours of 185 hours previously reported for this information collection. This is attributed to a new category of users that were added. These are aliens in A-3, G-5 or NATO-7 classifications requesting an extension of stay. USCIS estimates that there will be an increase of approximately 250 respondents. In addition, a review of USCIS adjudications completed annually that require the use this form was done, and the overall annual number of this form's use was determined to be 5550. Therefore, the annual number of respondents is expected to be 5,800.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. USCIS is not seeking a waiver to display the expiration date for OMB approval of this information collection.
18. USCIS does not request an exception to the certification of this information collection. Please see attached Item 19 of Form OMB 83-1.

B. Collection of Information Employing Statistical Methods.

Not applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including the paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Richard A. Sloan

Date

Director,
Regulatory Management Division,
U.S. Citizenship and Immigration Services,
Department of Homeland Security.